

## **Polek, Jim**

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**From:** Polek, Jim  
**Sent:** Friday, October 16, 2015 10:58 AM  
**To:** [devaulr@cityofnorthlasvegas.com](mailto:devaulr@cityofnorthlasvegas.com)  
**Cc:** Whitson, Amelia; Jackson, Julia  
**Subject:** EPA Order CWA-309(a)-15-011 September 22, 2015 Submittal

Mr. DeVaul,

Thank you for your submittal of the City of North Las Vegas' Industrial Pretreatment Program (IPP) Inventory List that was required by the subject Order and which we received on September 22, 2015. The IPP Inventory List is a good start. We have a general comment that needs to be addressed about the whole list and then some specific questions/comments.

### **General Comment**

The language in the subject Order for this submittal states: "Respondent shall submit an IPP inventory list of all non-domestic users, including current information on the source, nature and volume of the discharges. The submission shall include a list of specific users and criteria based on which the Respondent identifies the specific users that will require a control mechanism." It is not clear from your submittal what criteria is used to decide to permit non-domestic users. What criteria is used to determine whether an industrial user is a significant industrial user or class II. Is it based on flow, type of facility, etc. Please clarify the criteria that the City used to determine which facilities should be permitted and what type of permit that they should receive.

### **Specific Questions/Comments**

- 1) On pages 4, 5, and 13, there are a total of five industrial users (Deseret Palms Dental, Korner Kwik Lube, Korner Store & Carwash, POLO Cleaners, and J&S Pest Control) whose discharge flow rates are not clear and appear to be a calculation. Please clarify these flows.
- 2) On pages 11 and 15, there are two industrial users permitted as Class II zero discharge with large flow rates of sanitary wastewater based on the type of facility. They are Shadow Creek Golf Course (295,950 gpd) and CMEX (42,922 gpd). Please clarify how these facilities are generating these flow rates of sanitary wastewater.
- 3) On page 12, there are two facilities (Paint & Body Collision and Boston Cleaners) that appear to be based in Las Vegas. What are the discharge flow rates for these facilities?
- 4) Are your discharge flow rates measured or estimated from supply water flow rates? If estimated, how are they corrected for water loss during usage?
- 5) In the comment column throughout the list, the term "domestic" is incorrectly used. These are industrial users and by definition are not domestic users. If you are referring to sanitary discharges, please substitute "sanitary."

I would like to set a time that we can discuss these questions and comments. Please let me know your availability next week. Thank you for your attention to these issues.

Jim

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